

# **EXHIBIT A**

Blozis  
Linda J. Blozis, Volume 1

v.  
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1 Q. When you say, "time in," you mean years of  
2 service with the company?  
3 **A. Yes.**  
4 Q. Why do you feel that's indicative of age  
5 discrimination?  
6 **A. We were all on the same team.**  
7 Q. So by "more jovial," you mean joking around?  
8 **A. Friendlier, more outgoing.**  
9 Q. You felt that with the older workers he didn't  
10 have that same level of being friendly and outgoing?  
11 **A. No, I did not think that he had that same**  
12 **level.**  
13 Q. Was he like nasty to the older workers in the  
14 meeting?  
15 **A. I wouldn't use the term "nasty."**  
16 Q. But wouldn't you say that he wasn't as jovial  
17 or outgoing? I'm just trying to get a sense of how he  
18 was appearing with the younger workers as opposed to  
19 the older ones.  
20 **A. If he was friendly and jovial with the younger**  
21 **ones, it seemed apparent that he was aloof and distant**  
22 **and borderline rude to the older workers.**  
23 Q. And when you say, "borderline rude," what would  
24 he do?

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1 **A. Just if they asked questions he would be abrupt**  
2 **in his answers or not have time for them then.**  
3 Q. You felt with the younger workers he would  
4 answer their questions and have time to discuss  
5 whatever they were bringing up?  
6 **A. Yes.**  
7 Q. Did you ever approach him on this?  
8 **A. No.**  
9 Q. Did you ever speak with Rosemary or anybody  
10 from HR about how you felt the meetings were going?  
11 **A. Not that I recall at this time.**  
12 Q. Would it be at all of the meetings that you  
13 felt that way or some of them?  
14 **A. For the most part it would be at the**  
15 **predominance of the meetings. Not all of the team**  
16 **members were always included. It would depend on what**  
17 **the particular situation required, whether it be**  
18 **officers or officers and assistants.**  
19 Q. Would you be included on all of the meetings?  
20 **A. I was an assistant.**  
21 Q. So there would be meetings that you would not  
22 be included on?  
23 **A. There were at times, yes.**  
24 Q. In terms of when the meetings were and who

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1 would be included on the meetings, would there be an  
2 e-mail coming out from Brendan saying we're going to  
3 have a meeting on X date and A, B and C should be  
4 there at the meeting?  
5 **A. As I recollect, there could have been over the**  
6 **time frame that he was the team leader, yes.**  
7 Q. So you would get some advanced word of a  
8 meeting date and who was to attend the meeting?  
9 **A. For the most part, yes, there would be advanced**  
10 **notice.**  
11 Q. Then I think you testified that some meetings  
12 were done on the phone?  
13 **A. Yes.**  
14 Q. And some in person?  
15 **A. Yes.**  
16 Q. Any other examples of instances where you  
17 thought Gilmore was being discriminatory on the basis  
18 of age?  
19 **A. At this time I don't recall any.**  
20 Q. You also --  
21 **A. That's my phone.**  
22 MR. LaROSA: Let's go off the record for a  
23 second.  
24 (Discussion off the record.)

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1 BY MS. WILSON:  
2 Q. Now, with respect to your complaint you also  
3 have a gender discrimination allegation. And focusing  
4 in on Gilmore --  
5 **A. Excuse me. I'm going to shut my phone off.**  
6 Q. Oh, sure.  
7 **A. I'm sorry. Would you repeat the question?**  
8 Q. Sure. Ready?  
9 **A. Yes.**  
10 Q. Going back to Gilmore.  
11 **A. Yes.**  
12 Q. And focusing now on your gender discrimination  
13 claim.  
14 **A. Yes.**  
15 Q. Can you provide me with instances where you  
16 feel that Gilmore either by word or conduct was  
17 discriminating against you on the basis of gender?  
18 **A. To the best of my recollection, when I might be**  
19 **in the Philadelphia offices and working alongside a**  
20 **teammate for whatever purpose on an account I noticed**  
21 **that Dan Merlino would not seem to be as busy as we**  
22 **women might have been.**  
23 Q. And Dan Merlino was a portfolio administrator?  
24 **A. To the best of my recollection, that's how he**

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1 started on the team.  
2 Q. When you say that Dan wasn't as busy as the  
3 women, what women?  
4 A. It would have been while she was still under  
5 the employ Kathleen Agne, Marion whose name I don't  
6 recall.  
7 Q. I think I might have her name.  
8 Is it Marion --  
9 A. Marano.  
10 Q. -- Marano?  
11 A. It just came to me. Marano, Marion Marano.  
12 Q. M-a-r-a-n-o.  
13 A. Even Brendan's personal assistant, Cindy  
14 Chambliss.  
15 Q. Was Cindy a portfolio administrator?  
16 A. I don't know what her correct title was at this  
17 time since she was Brendan's personal assistant.  
18 Q. And Marion, she was a portfolio administrator?  
19 A. Yes, as I recall.  
20 Q. So when you say that you visited the  
21 Philadelphia office and Dan didn't seem to be as busy  
22 as the rest of the women, why did you take that to be  
23 gender related?  
24 A. Because I recollect there were instances in

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1 which Marion and Cindy would intimate to me that we  
2 have these tasks to complete and Dan did not have  
3 comparable tasks. He was not giving comparable tasks  
4 in a comparable work position.  
5 Q. And who would be the person in charge of giving  
6 Dan tasks?  
7 A. It would be Brendan Gilmore.  
8 Q. And did you ever do sort of your own  
9 investigation as to what task Dan was being given?  
10 A. I don't understand your question.  
11 Q. Did you know what task that Dan was being given  
12 to do?  
13 A. There were specific job duties listed that the  
14 portfolio administrators were responsible for and  
15 sometimes we might have to work in conjunction with  
16 one another or ask questions. It seems sometimes when  
17 I would call Dan he wouldn't have the answers. He  
18 would defer me to Marion or Cindy or one of the women.  
19 Q. And you took from there, from his deferment to  
20 the females that he didn't have the same work, the  
21 comparable work that you had to do?  
22 A. I took from there that he should have that  
23 answer as part of his job and he didn't have it.  
24 Q. So in terms of whether he had comparable work

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1 to do, do you know that?  
2 A. As I recollect, if he was given the title of  
3 portfolio administrator he would be given similar  
4 duties as we women would be given.  
5 Q. And you took that something was amiss when you  
6 would call and ask for information and he wouldn't  
7 know the answer?  
8 A. Yes.  
9 Q. Did that lead you to believe that either -- I  
10 mean, what I took from your answer is you would ask  
11 him a question, he didn't know the answer and you  
12 thought he should have known the answer?  
13 A. On some occasions, yes. On other times if I  
14 asked could you check on something for me, he would  
15 defer to I'll have Marion call you back or I'll have  
16 Cindy call you back.  
17 Q. And did you think there was something wrong  
18 with him --  
19 A. I thought that --  
20 Q. -- doing that?  
21 A. Yeah. I thought that he was very capable of  
22 getting the answers or being able to work as a team  
23 player and not defer to the women.  
24 Q. So it sounds like you were thinking that he

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1 wasn't pulling his weight?  
2 A. Yes.  
3 Q. And instead of saying I'll have so-and-so get  
4 you the answer that he should have gotten the answer  
5 himself and given it to you?  
6 A. Yes.  
7 Q. Did you ever have any conversations with  
8 Brendan Gilmore or Becker that Dan wasn't pulling his  
9 weight?  
10 A. You asked about the two of them.  
11 Q. Well, with either one of them did you ever have  
12 any conversations that Dan wasn't pulling his weight?  
13 A. I don't recall specifically at this time, no.  
14 Q. Do you know whether Kathleen or Marion or Cindy  
15 ever complained to Brendan or, and I'll use his last  
16 name, Becker, Bill Becker that Dan wasn't pulling his  
17 weight?  
18 A. I have no way of knowing that at this time.  
19 Q. Do you know whether Brendan or Bill had any  
20 knowledge that Dan wasn't pulling his weight?  
21 A. Do I have any knowledge? I don't know for sure  
22 that they would at this time.  
23 Q. Are there other examples of gender  
24 discrimination in connection with Gilmore?

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1 **A. None that I can recall at this time.**  
2 Q. If you would look at your complaint, paragraphs  
3 56a through d.  
4 **A. Yes.**  
5 Q. Just look at that because my question is  
6 earlier when we were talking about Brendan Gilmore you  
7 had stated that he wanted to eliminate older workers  
8 off the team and replace them with younger people.  
9 That's probably not a direct quote, but that was the  
10 gist of the testimony.  
11 Are these the younger people that you were  
12 referring, to 56a through d?  
13 **A. Yes.**  
14 Q. Now, with respect to looking at 56a, we have  
15 got Investment Officer Bill Becker. Is it your  
16 testimony that Bill replaced an older worker?  
17 **A. Bill Becker was ultimately put in place as the**  
18 **senior trust officer in Delaware. At the time of my**  
19 **first employment, that position was held by Mr. Robert**  
20 **Bell.**  
21 Q. So is it your testimony that Bill replaced  
22 Robert?  
23 **A. Considering the succession, Martha Feters had**  
24 **served as senior officer of Delaware in the interim**

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1 **between Mr. Bell and Bill Becker.**  
2 Q. So Bill replaced Martha?  
3 **A. Yes.**  
4 Q. Do you know whether there were any jobs, do you  
5 know whether there were any advertisements for the  
6 senior trust officer position?  
7 **A. At this time I don't recall if there were**  
8 **advertisements.**  
9 Q. Do you know whether there were any individuals  
10 who applied for the senior trust officer position?  
11 **A. To the best of my recollection -- when are you**  
12 **referring to? What time frame? I'm sorry.**  
13 Q. I was just following up on your testimony that  
14 Bill replaced Martha Feters as the senior trust  
15 officer.  
16 So my question was whether you knew  
17 whether there were people who applied for the position  
18 of senior trust officer around the period that Martha  
19 Feters left.  
20 **A. To the best of my recollection, I believe Bill**  
21 **said he was in competition with two other people, but**  
22 **I don't recall who they were.**  
23 Q. Looking at b, Dan Merlino, is that the same  
24 person we have been talking about, Masucci?

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1 **A. No. Ray Masucci was an officer. Dan Merlino**  
2 **was the portfolio administrator that I've been**  
3 **referring to.**  
4 Q. And he was in the Philadelphia office?  
5 **A. Yes.**  
6 Q. And did he replace an older worker?  
7 **A. Yes, I believe he did. And I can't remember**  
8 **her name at this time.**  
9 Q. In your complaint you have him as an investment  
10 assistant?  
11 **A. Yes.**  
12 Q. Is that the same thing as portfolio  
13 administrator?  
14 **A. To the best of my understanding, it's**  
15 **synonymous with portfolio.**  
16 Q. Do you know whether other individuals applied  
17 for the portfolio administrator/investment assistant  
18 position that Dan got?  
19 **A. I have no way of knowing at this time.**  
20 Q. You have Assistant Maria Dunlop. That's the  
21 Maria that we have been talking about in the Delaware  
22 office?  
23 **A. Yes.**  
24 Q. And she came in as the portfolio administrator,

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1 correct?  
2 **A. Yes.**  
3 Q. And did she replace anybody?  
4 **A. I don't know if it's correct to say she**  
5 **replaced, but Kathleen Agne was fired. There was the**  
6 **time lapse between March and then Maria was hired in**  
7 **July.**  
8 Q. Do you know whether others applied for the  
9 position that Maria ultimately got?  
10 **A. To my recollection, I think others did. There**  
11 **were other interviews conducted.**  
12 Q. Do you know who was being interviewed?  
13 **A. The names, I was not told who they were.**  
14 Q. Who was doing the interviewing for Maria's  
15 position?  
16 **A. Initially it would have been Greg Landis and**  
17 **then I'm under the understanding that Brendan Gilmore**  
18 **made the ultimate decision.**  
19 Q. And do you know whether any advertisements were  
20 placed for the position?  
21 **A. I'm not sure at this time.**  
22 Q. The next one, Investment Officer Kristy Hunt.  
23 **A. Yes.**  
24 Q. Was she in the Philadelphia office?

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